

**IV.D. Narrative Information Sheet****1) Applicant Identification**

- a) *Organization Name:* Sierra Institute for Community and Environment
- b) *Organization Address:* P.O. Box 11, 4438 Main St. Taylorsville, Ca 95983

**2) Funding Requested**

- a) *Grant Type:* Single Site Cleanup
- b) *Federal Funds Requested:*
  - i) Total Requested: \$500,000.00
  - ii) Cost share waiver: Yes

**3) Location**

- a) *City:* Crescent Mills
- b) *County:* Plumas
- c) *State :* California

**4) Property Information**

- a) *Property name:* Crescent Mills Former LP Mill Site
- b) *Site address:* 15690 Highway 89, Crescent Mills, CA 95934

**5) Contacts**

- a) *Project Director:*
  - i) Danielle Berry
  - ii) Phone Number: (530)284-1022
  - iii) Email Address: [dberry@sierrainstitute.us](mailto:dberry@sierrainstitute.us)
  - iv) Mailing Address: P.O. Box 11, 4438 Main St. Taylorsville, CA 95983
- b) *Executive Director:*
  - i) Jonathan Kusel
  - ii) Phone Number: (530)284-1022
  - iii) Email Address: [jkusel@sierrainstitute.us](mailto:jkusel@sierrainstitute.us)
  - iv) Mailing Address: P.O. Box 11, 4438 Main St. Taylorsville, CA 95983

**6) Population**

- a) *Area of Target Populations:* The targeted area for this project is the small ranching community of Indian Valley, home to approximately 2,500 people. The populated area includes the census designated places of Greenville (pop. 1,108), Crescent Mills (pop. 287; City where project is located), and Taylorsville (pop. 244) [Total Population 2018 ACS 5-Year Estimates].

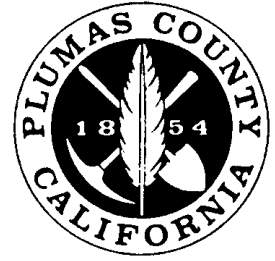
## 7) Other Factors Checklist

Other Factors	Page #
Community population is 10,000 or less.	Narrative pg. 1,5
The applicant is, or will assist, a federally recognized Indian tribe or United States territory.	X
The proposed brownfield site(s) is impacted by mine-scarred land.	X
Secured firm leveraging commitment ties directly to the project and will facilitate completion of the project/reuse; secured resource is identified in the Narrative and substantiated in the attached documentation.	Narrative pg. 4
The proposed site(s) is adjacent to a body of water (i.e., the border of the proposed site(s) is contiguous or partially contiguous to the body of water, or would be contiguous or partially contiguous with a body of water but for a street, road, or other public thoroughfare separating them).	Narrative pg. 1, 2
The proposed site(s) is in a federally designated flood plain.	Narrative pg. 2
The reuse of the proposed cleanup site(s) will facilitate renewable energy from wind, solar, or geothermal energy; or will incorporate energy efficiency measures.	Narrative pg. 2, 3, 6

## 8) Letter from the State Environmental Authority

Included in narrative attachments.

## **LETTER FROM ENVIRONMENTAL AUTHORITY**



# BOARD OF SUPERVISORS

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Kevin Goss  
Plumas County Supervisor  
District 2

October 27, 2020

Re: FY2021 U.S. EPA Cleanup Grant Program

To whom it may concern:

As the Plumas County District 2 Supervisor and Board Chair, I acknowledge and support the Sierra Institute for Community and Environment's (Sierra Institute's) applications to the U.S. Environmental Protection Agency (U.S. EPA) Brownfield Cleanup grant program.

The proposal under the Cleanup program to remediate a new parcel as part of the 28-acre Crescent Mills property cleanup for redevelopment as a wood products campus aligns with County's mission to preserve the environment and enhance public health through outreach, education, collaborative planning, and sensible applications of environmental health principles, laws, and statutes. The proposal aligns with the County's General Plan which seeks to 1) create and retain jobs, and reinvest wealth through our economy, community, and natural resources; 2) improve health and well-being of all Plumas County residents; and 3) promote a future for Plumas County citizens in which land use decisions balance social, economic, and natural resource health.

I know the Sierra Institute is the recipient of multiple grants awarded for the purposes of remediating and developing the Crescent Mills site and has made significant progress implementing remedial actions and initiating redevelopment efforts. Funds from the FY2021 US EPA Cleanup Grant Program will enable the Sierra Institute to expand upon the cleanup remedy that has been developed as part of existing EPA Brownfields Assessment and Cleanup grants for this location, as well as, facilitate expedited redevelopment of the site into a wood utilization campus that we so desperately need. Businesses on site will use a variety of technologies to generate value added wood products out of low value woody biomass material from forest and watershed restoration projects on surrounding forested land in Plumas County. The proposed redevelopment will contribute much needed economic revitalization in our impoverished county as rural Plumas County was hit particularly hard by the recent economic recession and associated downturn in the housing market.

The Sierra Institute staff have maintained a record of effectively engaging the Board and community members in their endeavors and readily provide opportunities to comment on and influence projects in both planning and implementation stages. The County has enjoyed this opportunity to collaborate on the project and believes that the proposals under both the Cleanup and Assessment applications aligns extremely well with the County General Plan.

We appreciate U.S. EPA's support for past work and strongly urge your continued support for this important project. Please don't hesitate to contact me should you have questions.

Sincerely,



Kevin Goss, Chair  
Board of Supervisors

## **NARRATIVE**

## **1. PROJECT AREA DESCRIPTION AND PLANS FOR REVITALIZATION. a. Target Area and**

**Brownfields. i. Background and Description of Target Area:** The Target Area for this project is the small, predominantly ranching and wood products focused community of Indian Valley, California. Home to approximately 2,500 people, the populated area includes the census designated places (CDPs) of Greenville, Crescent Mills, and Taylorsville. The remediation site is located in Crescent Mills in Plumas County, where the Sierra Nevada and Cascade mountain ranges join, an area revered for its clean air and water, beautiful natural surroundings and geologic wonders. The county has rich history of diverse land users including: Native American Mountain Maidu, multi-generational ranching and logging families, as well as numerous other residents who moved from urban areas to enjoy the mountain settings to raise families. With over a million acres of forestland, 80% of which is federally-owned, this area is also the headwaters of the Feather River, a source watershed for the State Water Project that serves approximately 27 million Californians and 750,000 acres of farmland.

The Target Area, like other rural forested communities, has struggled socioeconomically as a result of the compounding effects of the declining timber, mining, and building industries, and the Great Recession of 2008. These impacts are exacerbated by climate change, drought, and catastrophic wildfire. In 2020, the USFS Pacific Southwest Research Station reported that Tree Mortality in California totaled 129 million trees between 2010-2017 as a result of prolonged drought, higher temperatures and altered forest conditions. Intense fire suppression has created a landscape with increasingly dense forests more susceptible to catastrophic wildfire and declining watershed and forest health. In 2020, 8,100 fires in California burned 3.9 million acres, destroyed 7,500 structures and claimed 30 lives. Many of these fires burned in close proximity to the area proposed for remediation.

Improvements in forest health require wood utilization infrastructure. In addition to the challenges presented by declining socioeconomic conditions, local revitalization and redevelopment efforts are compromised by a lack of industrial sites suitable for development. Plumas County is mostly public land, with private parcels situated on rough terrain or located far from key transportation routes and driving up development costs. For these reasons, communities in this region rarely garner support from investors and have been challenged to improve socioeconomic conditions since the mid-1980's. The formerly robust wood products industry left a legacy of abandoned industrial sites that have been vacant for over 25 years. These sites often require remedial actions prior to redevelopment – a time consuming and expensive process, and one few communities can afford.

**ii. Description of the Brownfield Site.** The location for this cleanup grant is within a 28-acre property formerly owned by Louisiana Pacific (LP, the “Property”) and operated as a sawmill until it closed in the mid-1980s. Sierra Institute for Community and Environment (SI) obtained ownership in 2017. The property lies immediately off of Highway 89 in Crescent Mills, in an Opportunity Zone, within the greater Indian Valley community. Specifically, the Property is located at 15690 Highway 89, Crescent Mills. No structures remain on the Property from sawmill operations, but it contains a significant number of structural remnants including asphalt, concrete footers, and railing. The Property runs parallel between Indian Creek, a tributary of the North Fork of the Feather River, and Highway 89 through the Crescent Mills. A BNSF rail line and spur track runs between the Property and Highway 89. The populated area of Crescent Mills is located west of the Property, with some houses adjacent to the railroad line that separates them from the Property. The eastern edge is bordered by a wetland mitigation site owned by Caltrans, the state transportation department, that is working to restore wetland habitat along Indian Creek.

Brownfields revitalization funds are requested for three sites in the eastern portion of the property. Each site is approximately 2 -3 acres, collectively called “Phase 3,” and include: Site 1 “Maintenance Shop and Dry Lumber Storage Area” (northeastern portion of the property); Site 2 “New Planning Mill Area and New Dry Kiln Areas” (eastern portion of the property); and Site 3 “Green chain, Lumber Sorter and Stacker Area” (southeastern portion of the property). No previous cleanup award funding has been use for nor addressed the needs of these three sites.

Site assessments completed to date include: Preliminary Assessment/Site Inspection Report (Ca DTSC, 1990); Property Transfer Site Assessment (CH2M Hill, Inc., 1991); Supplemental Site Investigation Report (Geocon Consultants, Inc., 2002); Phase I ESA (Ecology & Environment Inc. (E&E), 2014); Targeted Brownfield Assessment (E&E, 2014); Targeted Site Investigation (TSI, Geosyntec Consultants, 2017); and Site

Characterization, Removal Action Workplan and Appendices ([RAW], SI, Sierra Streams Institute, and EKI Environment & Water Inc.).

These assessments established that arsenic and total petroleum hydrocarbon (TPH) contamination present on the Property is a result of mill practices such as spreading oil and incinerator ash on the roadways, and chemical treatments of wood products. The Phase I assessment revealed that tanks were removed and monitoring wells were installed under the guidance of the California State Water Resources Control Board. As a result of these monitoring efforts, no continued oversight was deemed necessary.

Arsenic in soil appears to be the most widespread soil contaminant (TSI, 2017). Groundwater tests indicate that arsenic in the soil has not resulted migrated into groundwater. The source of arsenic that is present on the Property may be related to lumber mill operations as identified above, or may also have been present in the import fill material brought to the site to raise the surface grade. If present, import fill was likely derived from off-site gold mining operations that are commonly associated with the presence of arsenic. The level of arsenic concentrations in shallow soil exceed the established 9.8 mg/kg background levels across several areas of the Property.

As with many of the brownfield sites in Plumas County, the Property lies within the Feather River Watershed. This watershed is a critical contributor to California's State Water Project and provides an average of 3.2 million acre-feet of water per year to downstream urban, industrial, and agricultural users. The adjacent Indian Creek and easternmost portion of the property, lie in a federally designated 100-year flood plain. Documented flooding established that a majority of the site has been flooded, some parts numerous times, suggesting contaminated soil is repeatedly washed into the creek and the Feather River resulting in negative environmental impacts to humans and wildlife. Impacts include potential exposure to suspended sediment or dissolved contaminants. The latter underscores the importance of remediating the contaminated sites.

Over the past two years, SI has successfully completed two stages of remediation efforts and will have completed a third stage by the end of October 2020. These areas address several 2-3-acre units located on the western portion of the 28-acre site. Work completed to date includes: on-site relocation of stockpiled wood waste (14,000 cy); excavation of clean on-site fill and placement over contaminated areas (9,200 cy); demolition of remnant concrete foundations within borrow areas (250 cy); consolidation of concrete and asphalt debris stockpiles (950 cy); on-site processing of concrete and asphalt debris to create aggregate base (1,200 cy) and disposal of rebar and metal debris; placement of crushed concrete aggregate as fill as cap in key redevelopment areas (900 cy); and stockpiling of remainder of aggregate (300 cy) for future redevelopment use. Following 2020 cleanup efforts, at least 5 acres of the site will be available for redevelopment with more needed for build out of the wood utilization campus. Of these 5 acres, half an acre is allotted to a chip processing business that is already onsite and functional. Additional clean fill material has been identified on-site and is scheduled to be placed during the spring and summer of 2021 utilizing the remainder of the 2018 and 2020 Brownfield Cleanup funds (Grant Nos. 99T74301 and 98T06801). However, additional fill material needs to be identified and or imported from off-site sources to facilitate complete remediation of the Property and enable the full development of the planned wood utilization campus.

**b. Revitalization of the Target Area i. Reuse Strategy and Alignment with Revitalization Plans.** SI has been working to redevelop the Property into an integrated wood utilization campus for the past six years with its partners as described below (see 2.b.i & ii). The campus will utilize a variety of technologies to create value-added wood products from low-value woody material from forest restoration and fire risk reduction efforts. Site reuse has been launched in the form of a wood chip processing yard that supplies chips to a boiler at the Plumas County Health and Human Services building in Quincy, California. Businesses to be developed include: Dried/packaged firewood operation, cross-laminated timber production, and a community-scale bioenergy facility that will burn chips to sell electricity to Pacific Gas & Electric pursuant to the Bioenergy Market Adjusting Tariff program. This project sites lies in one of the most productive wood baskets of California, in need of forest restoration and hazardous fuels reduction activities to reduce fire risk in this high fire hazard area.

The reuse of this Property aligns with the Plumas County General Plan ("General Plan"), which calls for greater utilization of biomass to reduce forest fuel buildup and to increase use of renewable fuels while reducing reliance



on fossil fuels. Remediation and redevelopment of the Property is supported by the County Board of Supervisors, Community Development Commission, and Department of Environmental Health, and will help to achieve the goals of the General Plan: 1) Create and retain jobs, and reinvest wealth through our economy, community, and natural resources; 2) Improve health and well-being of all Plumas County residents; and 3) Promote a future for Plumas County citizens in which land use decisions balance social, economic, and natural resource health.

The proposed reuse of the property also aligns with California Governor Brown's October 2015 Emergency Proclamation on tree mortality and the work of the Forest Management Task Force focused on increasing forest restoration and utilization of biomass. This reuse also comports with the California Natural Resources Agency's SB 859 Wood Products Working Group Recommendations to Expand Wood Products Markets in California (2017) that outlined three goals: 1) Remove state barriers and create pathways to success, focusing on challenges to redeveloping sites 2) Promote innovation, focusing on building the institutional infrastructure necessary to bring new wood products to market, and 3) Invest in human capital, building the necessary workforce to staff new wood products operations. These recommendations are advanced in the California's 2018 Forest Carbon Plan and the Joint Institute for Wood Products Innovation's recommendations for woody biomass utilization to be presented to the Board of Forestry in November 2020 that includes the statement: "to identify any statutes that unnecessarily restrict the conversion of brownfield sites to forest product and/or bioenergy facilities" and "to create brownfields coordinators to support local governments to redevelop these sites."

Plumas County, without an economic development agency, is within the sphere of influence of the Sierra Economic Development Corporation (SEDCorp) which identifies biomass utilization as one of two region wide development priorities and calls for "the continued exploration of the economic, environmental and triple bottom-line benefits of managing our forest by-product material." SI prioritizes utilizing sustainable development practices while redeveloping the Property. For example, developing wood utilization businesses on site provides not only a local outlet for forest biomass material, but it reduces pile burning in the woods that releases harmful emissions and improves air quality. The chip sorting and storage on the campus accepts small diameter trees and other woody biomass from local forest restoration and wildland-urban interface (WUI) fuels reduction projects.

**ii. Outcomes and Benefits of Reuse Strategy.** As a designated Opportunity Zone in Plumas County, the remediation and redevelopment of the Property as a wood utilization campus will catalyze community revitalization in the Target Area. Proposed operations include an assortment of business will increase the value of low value woody material that, in turn, will increase restoration and fire risk reduction activities. At the heart of this campus will be a 3-5 MW bioenergy facility that will utilize biomass as a renewable energy source, supply power to the grid and excess heat from facility for other product and business operations. SI is also exploring production of low carbon fuels from biomass. Jobs resulting from the campus build out and operations will spur local economic development and support a diverse range of skill sets including but not limited to: forestry, social and environmental specialists, haulers, facility operators, and a variety of managerial and administrative positions.

At full build out, the campus will:

- 1) Provide an outlet for dead trees from prolonged drought and beetle kill and small diameter understory trees that are widespread across the Sierra Nevada and posing a fire hazard to surrounding communities;
- 2) Increase the capacity of and incentive for local forest managers to conduct forest and watershed restoration efforts and hazardous fuels reduction treatments - thereby improving forest health, reducing the risk of catastrophic wildfire, and increasing carbon sequestration in northern Sierra Nevada forests;
- 3) Improve air quality for local residents by reducing the amount of forest biomass burned in open piles;
- 4) Strengthen the local economy in Indian Valley through development of new wood-product businesses;
- 5) Develop 15-25 much needed jobs for the socioeconomically-depressed communities in Indian Valley and Plumas County—the cleanup itself will generate a temporary work opportunity for at least 3-4 people.

**c. Strategy for Leveraging Resources i. Resources Needed for Site Reuse.** Funding has been secured from a variety of sources to support site assessment, cleanup and redevelopment efforts that are described in this document. Sources of funds leveraged to support Property redevelopment and associated tasks are in Table 1.

Table 1: Funds Leveraged to Support Crescent Mills Property Redevelopment

Source	Funding Name	Purpose/Products	Amount	Status
U.S. EPA	Targeted Brownfields Assessment 2014	Phase I, Phase II, and Analysis of Brownfield Cleanup Alternatives	\$200,000	Secured, completed
USDA Rural Development	Rural Business Development Grant 2015	To support Crescent Mills site buildout and provide support to potential business owners, increase capacity for site reuse	\$65,000	Secured, completed
Sierra Nevada Conservancy	Proposition 84 Grant Program 2015	Site development and mechanical work for wood chip operations	\$350,000	Secured, completed
U.S. Forest Service	Wood Innovations Grant 2016	Site engineering and planning for development of a bioenergy facility and wood utilization campus at the Crescent Mills site	\$250,000	Secured, in progress
Weyerhaeuser Family Found.	Sustainable Forestry and Communities 2017	For Crescent Mills wood products campus development	\$75,000	Secured, completed
Northern Sierra Partnership donor funds	2017	For purchase of Crescent Mills site	\$191,500	Secured, completed
Ca Department of Toxic Substance Control	Targeted Site Investigation 2017	Crescent Mills site characterization	\$149,000	Secured, completed
U.S. EPA	Brownfields Assessment Grant 2017	Crescent mills site characterization and cleanup planning	\$200,000	Secured, in progress
U.S. EPA	Brownfields Cleanup Grant 2018	Funding to clean up three brownfields sites in Crescent Mills, Ca	\$600,000	Secured, in progress
Resource Legacy Fund	Western Conservation program 2019	To advance wood utilization campus and associated state rural and natural resource policy	\$95,000	Secured, in progress
U.S. EPA	Brownfields Cleanup Grant 2020	Funding to clean up two Brownfields sites in Crescent Mills, Ca	\$500,000	Secured, in progress
Sierra Nevada Conservancy	Resilient Sierra Nevada Communities Program 2020	Crescent Mills site development and mechanical work for wood chip operations along with support for another biomass boiler in Plumas County.	\$937,075	Secured, in progress

**ii. Use of Existing Infrastructure.** The Property's historic use as a sawmill provides a foundation for brownfields remediation and wood products campus redevelopment. The 28-acre site is zoned "Heavy Industry"; approximately 11 acres were previously graded and paved for mill operations. The site is optimally located adjacent to a BNSF rail line and a spur historically used for shipping materials to and from the sawmill. SI has initiated the development of the wood products campus and supporting infrastructure (chip sorting and hauling equipment, chips shed, etc.) through the acquisition of federal, state, and private funding. Additional infrastructure needs key to the revitalization plan include a 3-5 MW bioenergy facility, additional biomass boilers in Plumas County, and other wood extraction and utilization operations. SI has been successful securing additional funding.

**2.COMMUNITY NEED AND COMMUNITY ENGAGEMENT. a. Community Need. I. Community's Need for Funding.** Plumas County has been designated as one of fifteen "Frontier Counties" of California due to its small population and geographic isolation. A majority of the county's 18,699 residents live in or near the four major communities: Portola, the only incorporated city; Quincy, the county seat; Greenville, the largest community in Indian Valley; and Chester. Table 2 below provides data on selected sociodemographic measures from the 2018 American Community Survey (ACS) 5-Year Estimates and 2017 ACS Estimates that highlight social and economic hardships in the Target Area and recent unemployment data from the State of California. Like other rural forested counties in California and throughout the U.S., Plumas County struggled economically even before the Great Recession of 2008, and mirrors historical stagnant timber industry communities throughout the Pacific West. Notably, the July 2020 unemployment totals are two and three times higher than unemployment rates from the previous year, reflecting a downturn in the Plumas County economy associated with the COVID-19 economic contraction. Local unemployment typically doubles in the winter due to seasonality of work in the area. With the erosion of jobs, Plumas County's population has been decreasing over the past decade.

Greenville, at 1,108 people, is one of the more impoverished communities in the county. The ACS estimates a poverty rate of 18.3% (compared to 11.67% for Plumas County and 14.3% for California). The Target Area far exceeds national, state, county, and local poverty rates with 26.3% of the community below the poverty level. Eligibility among children for Free or Reduced-Price Meals in Indian Valley is approximately 56.9% for the 2019-2020 school year, 6.3% higher than the 2018-2019 school year (Education Data Partnership, 2020).

Table 2: Selected demographic factors comparing the Target Areas (Crescent Mills, Greenville, and Taylorsville) against regional, state, and national standings.

Demographic Factors	United States	California	Plumas County	Crescent Mills CDP	Greenville CDP	Taylorsville CDP
Total Population	322,903,030	39,148,760	18,699	287	1,108	244
Median Household Income <sup>1,2</sup>	\$ 60,293.00 <sup>1</sup>	\$ 71,228 <sup>1</sup>	\$ 53,270 <sup>1</sup>	-	\$ 29,328.00 <sup>2</sup>	\$ 81,277.00 <sup>2</sup>
American Indian and Alaska Native	0.8%	0.8%	2.3%	27.9%	5.0%	0.0%
Hispanic or Latino	17.8%	38.9%	8.7%	6.8% <sup>3</sup>	5.0% <sup>3</sup>	0.0% <sup>3</sup>
Unemployment Rate <sup>3,4</sup>	10.5% <sup>4</sup>	13.9% <sup>4</sup>	11.2% <sup>4</sup>	-	2.5% <sup>3</sup>	33.3% <sup>3</sup>
Below Poverty Level	14.0%	14.3%	11.67%	26.3% <sup>3</sup>	18.3% <sup>3</sup>	0.0% <sup>3</sup>
Households Receiving Cash Public Assistance or Food Stamps/SNAP	12.9%	10.2%	9.0%	13.9% <sup>3</sup>	7.3% <sup>3</sup>	21.9% <sup>3</sup>

Source: 2018 American Community Survey (ACS) 5-Year Estimates except where noted.

(-) no data available

1. Dollar amount in 2018 inflation adjusted dollars. Data from 2018 ACS 5-Year Estimates.

2. Dollar amount in 2018 inflation adjusted dollars. Data from 2017 ACS Estimates.

3. Data from 2017 ACS Estimates. (Not available from 2018 ACS 5-Year Estimates.)

4. Civilian population in labor force 16 years and over: <sup>3</sup>American Community Survey 2017; <sup>4</sup>CA Employment Development Department, July 2020 totals.

Until recently, the impacts of the declining timber industry were softened by a coinciding increase in tourism and construction of second homes in Plumas County. Plumas County retained some timber industry due to the presence of two mills, but the local economy shifted from a resource-based economy to one dependent on construction and service industry jobs. The Great Recession worsened economic conditions in Plumas County, and unemployment reached a high point of 16.8% in 2010, with some communities experiencing rates over 20%. Newly rising unemployment rates suggest a repeat of economic decline, underscoring the need for this work.

Plumas County has no economic development agency. This fact, along with the remoteness of the Indian Valley area and the small and largely impoverished local population, make it difficult to raise capital or attract businesses and entrepreneurs to advance business development and remediate sites such as Crescent Mills. Beyond the impoverished nature of Plumas County, remediation funding is essential because the applicant is a non-profit organization lacking the reserves to complete this work. The past six years of work by SI has launched remediation and community revitalization efforts on what would otherwise have remained a vacant, contaminated site.

**ii. Threats to Sensitive Populations. 1. Health or Welfare of Sensitive Populations.** Sociodemographic indicators comparing the Target Area to state, regional, and national standings reveal that the Target Area is within the 56<sup>th</sup>, 56<sup>th</sup>, and 57<sup>th</sup> percentiles respectively for low-income populations; the 12<sup>th</sup>, 14<sup>th</sup>, 45<sup>th</sup> percentile respectively for minority populations; the 88<sup>th</sup> percentile for children (under age of 5), and 51<sup>st</sup>, 50<sup>th</sup>, 40<sup>th</sup> percentile respectively for persons over the age of 64. In addition, the American Indian population of Crescent Mills (27.9%) far exceeds county (2.3%), state (0.8%), and national (0.8%) levels.

**2. Greater Than Normal Incidence of Disease and Adverse Health Conditions.** Compared to national data, Indian Valley is within the 54th percentile for NATA Air Toxics Cancer Risk and 53<sup>rd</sup> percentile for NATA Respiratory Hazard Index, but these data ignore episodic and hazardous smoke events common with open pile burning and wildfire. Emergency department visits due to asthma in Plumas County exceed state occurrences with 61.1 per 10,000 people, a number that increased in 2020 given massive wildfires and smoke events. In 2015,

100% of 72 children examined tested positive for childhood lead poisoning and in 2016 11.6% of the adult population was diabetic (up 2% from the previous year). Historically, Plumas County also has a higher death rate 302 people per 100,000 when compared to the state (151) and the nation (185) (CDC Cancer Data 2013). Common throughout rural communities of the Sierra, environmental and health statistics often fail to accurately reflect conditions because the most serious cases are transferred to out-of-area hospitals handling high risk patients.

**3. Disproportionately Impacted Populations.** Indian Valley residents have repeatedly endured social, environmental, economic, and health impacts associated with large wildfires. Recent large fires include: the 2007 Moonlight Fire that burned 65,000 acres on its northeastern border; the 2012 Chips Fire located 10 miles away along the west shore of Lake Almanor that burned over 75,000 acres and shut down the tourist season for the month of August; the 2019 Walker Fire that burned 54,000 acres along the Valley’s eastern border and created extremely dense and hazardous smoke in the valley for over two weeks; and the 2020 North Complex Fire that has burned just under 319,000 acres that when combined with the Sheep and Hog fire to the north layered dense smoke in Indian Valley for much of August and September in 2020.

Smoke from fires expose the population to unhealthy levels of four primary pollutants: 1) particulate matter (PM 2.5 and PM 10), 2) ground level ozone, 3) carbon monoxide, and 4) black carbon, all of which can contribute to increased rates of respiratory, cardiovascular, and other illnesses, particularly for residents with underlying health issues. This is exacerbated where poverty is high and access to health care services is limited. In addition to the negative environmental and health impacts caused by wildfires, Plumas County residents are also impacted by open pile burning. Open pile burning ranges from pile burning of thinned material in the forest to backyard burning of wood waste. Poorly managed burning contributes to poor air quality and can lead to forest fires. Confined boiler burning of woody biomass can reduce criteria pollutants by 100x compared to open pile burning (Springsteen 2011, Emission Reductions from Woody Biomass Waste for Energy as an Alternative to Open Burning). Thus, remediation and campus development will help reduce resident health impacts aggravated by previous industrial activities and residual heavy metals and other related and current environmental hazards.

Redevelopment of the Crescent Mills Property into a wood products campus with a biomass-fired combined heat and power facility will provide a local outlet for woody biomass – and, as a result, simultaneously improve air quality for the above sensitive populations while producing renewable energy (and reducing fossil fuel use).

**b. Community Engagement. i. Project Involvement and ii. Project Roles.**

Partner Name / contact	Description / Specific Role in the Project
Plumas County Board of Supervisors: Kevin Goss, Chair, ( <a href="mailto:kevin.goss4district2@gmail.com">kevin.goss4district2@gmail.com</a> ) & Lori Simpson, ( <a href="mailto:lorisimp@inreach.com">lorisimp@inreach.com</a> ), (530) 283-6170	Both support redevelopment of the site, especially development of a wood utilization campus. Crescent Mills lies in Goss’ District 2 area, and he has actively advocated for it in multiple venues.
Plumas County Department of Environmental Health: Jerry Sipe, <a href="mailto:quincyenv@countyofplumas.com">quincyenv@countyofplumas.com</a> , (530) 283-6355	Provides technical and permitting assistance for assessment and cleanup efforts.
Plumas County Community Development Commission (530) 283-2466	Is the awardee of the 2017 EPA Brownfield Assessment Grant under which they coordinate assessment efforts with sub-awardees (SI and Sierra Streams Institute)
Plumas County Planning Department Tracey Ferguson, <a href="mailto:traceyferguson@countyofplumas.com">traceyferguson@countyofplumas.com</a> , (530) 283-7011	Provides technical and permitting assistance for cleanup and redevelopment efforts.
U.S. Forest Service: Dave Kinatader, <a href="mailto:david.kinatader@usda.gov">david.kinatader@usda.gov</a> , 530-283-7671	Supports the development of a local wood products campus that can utilize small diameter trees and other woody biomass from forest restoration projects.
Feather River Resource Conservation District: Brad Graevs, <a href="mailto:bgraevs@frrcd.org">bgraevs@frrcd.org</a> , (530) 927-5299	Works with CalTrans to restore the wetland east of the Crescent Mills site. Offers input on cleanup and redevelopment work.
Cal Trans: Kelly Kawsuniak, <a href="mailto:Kelly.m.kawsuniak@dot.ca.gov">Kelly.m.kawsuniak@dot.ca.gov</a> , 530-225-2789	See Feather River RCD role above. Is also coordinating with the SI to explore options for suitable fill material.
Plumas County Fire Safe Council: Hannah Hepner, <a href="mailto:plumasfiresafe@plumascorporation.org">plumasfiresafe@plumascorporation.org</a> , (530) 927-5281	Coordinates with the SI to identify outlets for forest biomass coming from their fuels reduction projects. Crescent Mills has already been used to store chips from a local WUI fuels reduction project for use in the Quincy boiler.

Center for Creative Land Recycling (CCLR): Ignacio Dayrit, ignacio.dayrit@cclr.org, (415) 728.3848	Has supported assessment and cleanup efforts to date. Provides technical assistance on the cleanup process and provides connections to experienced brownfield professionals.
Crescent Mills, Greenville, & Taylorsville CDPs, N/A*	Supplies information regarding historic site uses. Provides input on future development ideas and community needs.
* There are a few community organizations in the valley due to the small size; SI frequently reaches out to various community members for engagement.	

**iii. Incorporating Community Input.** The project will implement a community engagement process in the Indian Valley area. Due to the small and dispersed nature of our community, it is difficult to reach a large audience. A handful of people attend public meetings, while others may not have interest in or the capability to come to such an event. Beyond public meetings and bulletin boards and Facebook, many rely on a local on-line source (operated by the former local print media company) for news and events. With this in mind, SI will pursue diverse avenues to ensure the Indian Valley community is aware of the project and has ample opportunity to provide feedback throughout its development. Regular outreach will be conducted throughout the cleanup process, especially to keep the community apprised of when remediation work is occurring in an effort to inform and reduce impacts. Strategies to engage and inform community include: virtual community meetings, press releases in the local on-line “newspaper,” social media updates, flyers, and web-based information. To mitigate exposure and risk associated with Covid-19, SI will prioritize virtual outreach and socially distant events.

The local news agency, Feather Publishing, has tracked progress on Crescent Mills redevelopment and, more recently, cleanup efforts completed to date. SI will continue to communicate closely with reporters so updates are published in the paper to educate and inform the local community. SI will continue to update its “Brownfields Program” section on its website that provides regular updates and resources for other rural forested communities interested or already engaged in brownfield redevelopment. Relevant project updates will be shared directly with Plumas County Board of Supervisors and other relevant local government personnel.

Results and lessons learned from the project will continue to be shared by SI with its network of 18 forest landscape collaboratives from across California. Dissemination of information and resources with these groups and associated communities will increase awareness of the remediation process in California for assessing, cleaning up, and removing liabilities associated with brownfields. Moreover, it will help build rural community capacity and success associated with brownfield assessment, site redevelopment and forest biomass utilization.

**3. TASK DESCRIPTIONS, COST ESTIMATES, AND MEASURING PROGRESS. a. Proposed Cleanup Plan.** The primary constituent of concern at the Site is arsenic in the soil. Following an Analysis of Brownfield Cleanup Alternatives, SI is pursuing a cleanup remedy involving capping with institutional controls. This method includes laying clean fill as a cap and barrier to contaminated soil in areas where arsenic levels are above background levels. Institutional Controls in the form of land use covenants will be recorded to limit future use of the property to industrial use. This strategy will require ongoing monitoring and maintenance of the cap, but is considerably less expensive than an “excavate and dispose” remedy, as it does not involve transport and disposal of excavated soil to a distant landfill. Capping is cost effective and can be instituted relatively quickly. It allows for timely redevelopment of the property, and ensures the health and safety of on site workers. Capping is described in detail in the official RAW finalized in August 2019. If the proposal is awarded, SI will continue cleanup and redevelopment immediately after execution of the cooperative agreement.

**b. Description of Tasks/Activities and Outputs.**

Task 1: Programmatic Management, Oversight and Reporting
i. Project Implementation: provides funds for SI staff project management and oversight costs, including selecting qualified contractor to implement cleanup activities, managing the project budget and contractors as appropriate, communicate with EPA project officer, develop progress reports (consistent with EPA reporting requirements and process), developing the final project report, and managing other project activities as needed.
ii. Anticipated Project Schedule: FY Quarter 3 2021 to FY Quarter 2 2024

<i>iii.</i>	Task/Activity Lead(s): Jonathan Kusel & Danielle Berry
<i>iv.</i>	Output(s): Performance reports, final report, photos (before/after cleanup).
Task 2: Community Engagement and Outreach	
<i>i.</i>	Anticipated Project Schedule: FY Quarter 3 2021 to FY Quarter 2 2024
<i>ii.</i>	Task/Activity Lead(s): Jonathan Kusel & Danielle Berry
<i>iii.</i>	Output(s): Presentation and outreach materials.
Task 3: Cleanup Implementation	
<i>i.</i>	Project Implementation: Ensure timely and safe implementation of remediation of three sites on the eastern portion of the Crescent Mills property, to be conducted by the selected remediation contractor. The sites will be cleaned up in accordance with the approved Removal Action Plan (RAW). Work will be performed in accordance with applicable federal, state and local regulations. Cleanup activities include soil capping and stockpile relocation. The RAW describes cleanup activities in detail along with institutional controls.
<i>ii.</i>	Anticipated Project Schedule: Primarily FY Q3/4 2021 with remaining work to be completed as needed FY Quarter 3/4 2022 and FY Quarter 3/4 2023
<i>iii.</i>	Task/Activity Lead(s): Jonathan Kusel & Danielle Berry
<i>iv.</i>	Output(s): Soil capping, and a Removal Action Cleanup Report

### c. Cost Estimates

Table 4. Budget Summary

Budget Categories		Project Tasks (\$)			Total
		Task 1: Project Management and Reporting	Task 2: Community Outreach	Task 3: Cleanup Implementation	
Direct Costs	Personnel	\$43,875	\$8,055	\$13,920	\$65,850
	Fringe Benefits	\$0	\$0	\$0	\$0
	Travel	\$1,245.84	\$71.92	\$793.44	\$2,111.20
	Equipment	\$0	\$0	\$0	\$0
	Supplies	\$500	\$500	\$0	\$1,000
	Contractual	\$0	\$0	\$398,434.80	\$398,434.80
	Other	\$14,154	\$1,500	\$16,950	\$32,604
Direct Costs		\$59,774.84	\$10,126.92	\$430,098.24	\$500,000
Indirect Costs		\$0	\$0	\$0	\$0
20% Cost Share				\$100,000	\$100,000
Total Budget		\$59,774.84	\$10,126.92	\$530,098.24	\$600,000

#### Task 1: Programmatic Management, Oversight, and Reporting

-Personnel Costs: \$43,875 for SI staff time including Executive Director, Project Manager, and Financial Manager

-Travel Costs\*: 1) To Crescent Mills to facilitate, report on, and coordinate cleanup efforts- 12 miles roundtrip, 31 trips = \$215.76; 2) To Quincy to provide updates to local government and other interested organizations- 44 miles roundtrip, 4 trips = \$102.08; 3) To Sacramento to provide updates and distribute lessons learned to other agency personnel – 300 miles round trip, 2 trips = \$348.00; 4) Additional funds to conference(s)/workshop(s) yet to be determined relevant to brownfield cleanup = \$580

-Supply Cost: Supplies for miscellaneous office needs including but not limited to, printing, postage, phone, and computer supplies = \$500

-Other Cost: 1) Sub-award to Sierra Streams Institute (SSI) to advise project and assists with project oversight and management = \$11,250; 2) Permit fees for California State Water Resources Control Board Stormwater Pollution Prevention Plan (SWPPP) [904], building permits from Plumas County, and other required permits to be determined = \$2,904

-Cost Share: \$0

## Task 2: Community Engagement and Outreach

-Personnel Costs: \$8,055 for SI staff to lead this task.

-Travel Costs\*: 1) To Crescent Mills to provide community updates and facilitate public engagement- 12 miles roundtrip, 3 trips = \$20.88; 2) To Quincy to provide updates and facilitate public engagement with local community members, government, and other interested organizations- 44 miles roundtrip, 2 trips = \$51.04

-Supply Cost: Supplies for outreach meeting materials including printing and expenses associated with informational handouts=\$500

-Other Cost: 1) Sub-award to SSI to advise and participate in community outreach efforts = \$1,500

-Cost Share: \$0

## Task 3: Cleanup Implementation

-Personnel Costs: \$13,920 for SI staff to oversee, coordinate, and report on implementation/construction activities.

-Travel Costs\*: 1) To Crescent Mills to provide implementation/construction oversight and conduct inspections and monitoring as needed- 12 miles roundtrip, 100 trips = \$691.36; 2) To Quincy to for permitting purposes and to coordinate with and report to state and local officials- 4 trips, 4 miles round trip = \$102.08

-Contractual Cost: 1) Cleanup implementation on 6-9 acres = \$345,839; 2) Compaction testing = \$7,000; 3) SWPPP inspections and reporting = \$7,000; 4) Engineering and construction management = \$5,000; 5) Hydroseeding = \$23,195.80; 6) water and water truck for implementation activities such as dust control and hydroseeding- water truck at \$120 per hour and water at 2.5 cents per gallon = \$6,000; and 7) other contractual activities as needed to carry out remedial efforts = \$4,400

-Other Cost: 1) Sub-award to SSI for cleanup implementation supervision and reporting = \$17,950.

-Cost Share: \$100,000.00 from onsite clean fill.

(\*) Travel costs estimated using IRS Mileage Reimbursement Rate.

A detailed description of the cost share is included in the Threshold Eligibility attachment. Direct costs are based on actual values for cleanup work being conducted under the previous Brownfield grants.

**d. Measuring Environmental Results. 1. Outputs from this project include** Quarterly Progress and final reports, 2-3 community meetings and supporting documentation, project updates for community via local news outlets, soil capping and site cleanup, and a cleanup report. Outputs will be tracked quarterly throughout the grant.

**2.Outcomes include:** Increased community awareness tracked by active participation in engagement efforts; remediation of 6-9 additional acres; reduced community exposure to Property contaminants; and creation of several temporary jobs during cleanup. Acres remediated, exposure reduction, and jobs created will be tracked and reported in Progress and Final reports as will the progression of business development on the Property. (\*Long-term outcomes include utilization of at least 35,000-50,000 bone dry tons of biomass per year, equivalent to treating 3,000 – 5,000 acres of forest land annually for restoration and reduced fire risks. A fully developed wood products campus will include 3-4 new businesses in Crescent Mills, generating between 15 - 25 jobs.)

**4. PROGRAMMATIC CAPABILITY AND PAST PERFORMANCE. a. Programmatic Capability. i. Organizational Structure and ii. Description of Key Staff.** This Cleanup Grant will be managed by a program lead, with overall oversight by an executive director/program director. SI's financial manager will be responsible for managing finances and submitting invoices to the EPA's invoicing system.

For over 25 years, SI has successfully managed a variety of local, regional, and national projects, along with local and regional networking projects. The organization has been engaged in forest restoration and rural community development issues since it was launched in 1992, and has actively focused on woody forest biomass utilization as an integral part of reducing risk of catastrophic wildfire, creating local jobs, and improving the ecological condition of forests since 2009. SI is active in state and federal policy discussions, and works with multiple community organizations and businesses involved in the development of community-scale biomass utilization.

Dr. Kusel is the founder and the Executive Director of SI. He received his Ph.D. from the University of California Berkeley in natural resource sociology and policy, and a Masters of Forest Science from Yale School of Forestry and Environmental Studies. He has led the organization since its inception, and worked to help rural communities thrive by bringing people and ideas together to improve socioeconomic conditions and natural resource management. He conducted pioneering work to develop the concept and assessment of community capacity. Dr. Kusel led both the community assessment and public involvement teams for the Congressionally funded Sierra Nevada Ecosystem Project during which he developed a new approaches to 1) assessing rural community well-being and 2) engaging stakeholders and incorporating public knowledge and comment into the science project.

Danielle Berry is involved in the collaborative forestry and biomass utilization initiatives at SI. Ms. Berry currently serves as the Project manager for ongoing cleanup efforts at Crescent Mills and will continue to serve this role. She received her Master's in Environmental Policy and Management from University California Davis and has over five years of professional experience in a variety of natural resource fields. Prior to joining SI, she served as the environmental compliance specialist for a design build contractor constructing a 22-mile segment of the California High Speed Rail. Ms. Berry is experienced in managing projects, budgets, contractors, field crews and timelines for a variety of projects and is also knowledgeable in a variety of environmental compliance permitting and project implementation processes for local, state, and federal agencies.

**iii. Acquiring Additional Resources.** To date, SI has successfully secured contractors and subrecipients to implement assessment and cleanup activities supported through funds identified in Table 1. A subrecipient (SSI) and multiple contractors (NST Engineering, J&C Trucking, and various construction contractors) have been active in Property assessment and cleanup efforts and will continue. SI will conduct cost analysis and create new contracts for all new product and service needs in accordance with procurement provisions of 2 CFR Part 200.

**b. Past Performance and Accomplishments. i. Currently Has or Previously Received an EPA Brownfields Grant.** SI received two EPA Brownfields Grants (2018 and 2020) and has been successful managing cooperative agreements and remediation from the awards for multiple brownfields sites within the Property. Remediation funding is enabling the revitalization of a former LP lumber mill into the wood products campus described herein and is helping to create local sustainable jobs. Work under this grant to date is outlined in Section 1.A. ii.

**1. Accomplishments.** Utilizing funding secured to date, SI and partners successfully completed a variety of site assessments/characterization reports (Section 1.a.ii) allowing cleanup to be completed on 6 acres with and additional 3 acres to be completed by the summer of 2021. Additional outcomes include public engagement efforts (meetings, news bulletins, etc.) that increased awareness of Property cleanup and redevelopment and resulting in widespread support for it throughout the county. These outputs and outcomes are reflected in the Assessment Cleanup and Redevelopment Exchange System (ACRES).

**2. Compliance with Grant Requirements.** SI has maintained compliance with the workplan, schedule, and terms and conditions under the current cleanup grant. Many outputs for the project have already been completed or are ongoing including: 1) quarterly performance reports, contractor selection documentation, Regulatory oversight reporting, ACRES reporting; 2) creation, distribution, and documentation of public engagement materials; and 3) documentation of Addressing Changing Climate Concerns in the Analysis of Brownfield Cleanup Alternatives, and assessment/cleanup documents listed in Section 1.a.ii.

Progress towards achieving expected results has been documented in quarterly reports and updated in ACRES. The last report for FY Quarter 3 was submitted on July 31<sup>st</sup>, 2020. This report documented cleanup activities initiated in April of 2020 and summarized budget expenditures to date.

SI's open Cleanup Grants started July 1<sup>st</sup>, 2018 and July 1<sup>st</sup>, 2020 and end October 31<sup>st</sup>, 2021 and October 23<sup>rd</sup>, 2023 respectively. Remaining funds will be used to continue remediation efforts on the sites identified in the Grant Agreements. Under these awards SI is currently undergoing additional site planning and investigations through the winter of 2020 to reinitiate capping of the contaminated sites in the 2021 field season.



## **THRESHOLD CRITERIA**



## FY2021 EPA Brownfield Cleanup Application

### Threshold Criteria

1. **Applicant Eligibility:** Sierra Institute for Community and Environment is a 501(c)(3) non-profit organization. Documentation of tax-exempt status (Articles of Incorporation) is included in the narrative attachments.
2. **Previously Awarded Cleanup Grants:** Sierra Institute was awarded a Cleanup Grant in 2018 and 2020 to cleanup different sites on the Crescent Mills property. The site proposed in this application is on the Crescent Mills property but has not received funding from the previously awarded grant.
3. **Site Ownership:** The site is owned by Sierra Institute and was purchased on October 25, 2017.
4. **Basic Site Information:**
  - a. Site Name: Crescent Mills former LP Mill Site
  - b. Address: 15690 Highway 89, Crescent Mills, CA 95934
  - c. Owner: Sierra institute for Community and Environment
5. **Status and History of Contamination at the Site:**
  - a. Contaminant: The site is primarily contaminated with hazardous substances, including arsenic. Total petroleum hydrocarbon (TPH) is on site but levels are not significant.
  - b. Operational Uses and Current Uses: Plumas Lumber Company, a small-scale sawmill operated on the site until the late 1940s; whether or not a significant contamination occurred as a result of this operation is unknown. Louisiana Pacific (LP) company later operated a saw mill on the property until the mid 1980s. These sawmill practices resulted in release of arsenic, dioxins/furans, and TPH on site. The property remained vacant when the sawmill closed in the mid 1980s until Sierra Institute initiated remediation implementation in 2019. A small, remediated, portion of the property is now an active chip storage and sorting facility used to process chips from local forest restoration activities for use in a biomass boiler used to supply heat and generate power at the Plumas County Human Health and Services building in Quincy, California.
  - c. Environmental Concerns: A Targeted Site Investigation (TSI) was completed in April 2017. The TSI identified that arsenic in soil appears to be the most widespread contaminant and is present on several areas on the property at variable levels that are just above background/screening levels (9.8 mg/kg). Groundwater tests indicate that the arsenic in the soil has not resulted in groundwater impacts at the site.
  - d. Contamination Source and Quantity: According to assessments performed on site to date, the LP sawmill contributed to contaminated soils on site. Contamination primarily resulted from the common practice of spraying used oil and incinerator ash on mill roads for dust suppression purposes. Other activities that may have resulted in contamination include releasing of an anti-staining application to finished wood products containing pentachlorophenol (a chemical used in the past as a biocide to protect timber from fungal staining). A Targeted Site Investigation

completed in 2017 for the site suggests that arsenic contamination is also from mine tailings that were used to initially develop the site. The predominant constituent of concern on the site, arsenic, has been documented throughout soils on the site at levels just above background/screening levels (9.8 mg/kg). Assessments have determined that contaminants on site are not impacting the groundwater.

**6. Brownfields Site Definition:**

- a. The site is not listed or proposed for listing on the National Priorities List.
- b. The site is not subject to unilateral administrative orders, court orders, administrative orders on consent, or judicial consent decrees issued to or entered into by parties under CERCLA.
- c. The site is not subject to the jurisdiction, custody, or control of the U.S. government.

**7. Environmental Assessment Required for Cleanup Grant Applications:** Phase II and equivalent assessments completed to for the site include: 1) Phase II - November 2014; 2) Targeted Site Investigation - April 2017; 3) Follow up Site Characterization Report – February 2018; and 4) Removal Action Workplan – August 2019.

**8. Enforcement or Other Actions:** There are no known ongoing or anticipated environmental enforcement or other actions related to this site.

**9. Sites Requiring a Property- Specific Determination:** This site does not require a property-specific determination.

**10. Threshold Criteria Related to CERCLA/Petroleum Liability:**

a. Property Ownership Eligibility-Hazardous Substance Sites

i. *Landowner Protections from CERCLA Liability:*

1. Bona Fide Prospective Purchaser Liability Protection

In addition to the information provided in this sections, Sierra Institute certified that as the owner they are not liable in any way for contamination at the site or affiliated with any other person potentially liable for the contamination. Further, Sierra Institute will not impede performance of a response action or natural resource restoration.

a. Information on the Property Acquisition:

- i. *Ownership Acquisition:* Property acquired through a negotiated agreement with private individual; a lease-purchase agreement was in place for two years prior to Sierra Institute acquiring ownership.
- ii. *Date of Acquisition:* October 25, 2017.
- iii. *Nature of Ownership:* Sole Ownership.
- iv. *Transferor Information:* Purchased from Greg Lehman, Gary Lehman, and Jennifer Glanzmann
- v. *Relationships with Prior Owners:* No relationship with prior owner other than lessor/lessee relationship.

b. Pre-Purchase Inquiry:

- i. *Types of Assessments Performed:* The following assessments were completed prior to Sierra Institutes involvement with the site:

- 1. Preliminary Assessment/Site Inspection Report (California Environmental Protection Agency Department of Toxic Substances Control [DTSC],1990)

2. Property Transfer Site Assessment (CH2M Hill, Inc. [CH2M Hill], 1991)
3. Supplemental Site Investigation Report (Geocon Consultants, Inc.[Geocon],2002)

The following assessments were completed for Sierra Institute:

1. Phase I (Phase I (Ecology & Environment)– July 2014
  2. Phase II (Targeted Brownfield Assessment Final Report by Ecology & Environment) – November 2014
  3. Targeted Site Investigation (Geosyntec Consultants, oversight by California Department of Toxic Substance Control)– April 28, 2017
  4. Phase I (Geosyntec Consultants, oversight by California Department of Toxic Substance Control [DTSC])– April 28, 2017
  5. Follow-up Site Characterization Report (Sierra Streams Institute) – February 2018
  6. Removal Action Workplan (Sierra Streams Institute; reviewed and approved by EKI Environment & Water Inc.) – August 2019
- ii. *Assessment Entity and Qualifications:* Phase I/II environmental site assessment was completed by Ecology and Environment in July 2014; this was contracted by the U.S. EPA. TSI and Phase I environmental assessments were completed Geosyntec Consultants in April 2017; this was contracted by the CA DTSC.
  - iii. The property was purchased on October 25, 2017, within 180 days of the Phase I completion date (April 28, 2017) – Sierra Institute is a Bona Fide prospective purchaser.
- c. Timing and/or Contribution Towards Hazardous Substances Disposal: All hazardous substances disposal occurred before Sierra Institute acquired the property. Sierra institute has not, at any time, arranged for the disposal of hazardous substances at the site or transported hazardous substances to the site.
  - d. Post-Acquisition Uses: The only post-acquisition use on the property consist of a small (~1-acre) area that has been remediated under a previous Cleanup Grant. This area is being used as for wood chip storage and sorting operation; the operation utilizes a chip sorting machine which is located on the clean area. There are no other uses of the property including structural or other development to date.
  - e. Continuing Obligations: Sierra Institute certifies that they are exercising appropriate care by taking responsible steps to (i) stop continuing releases, (ii) prevent any threatened future release, and (iii) prevent or limit exposure to any previously released hazardous substances. Responsible steps include: limiting access to the property- property is enclosed with a fence and locked gate; monitoring known contaminants- Sierra Institute has carried out several site assessments and conducted air monitoring during cleanup activities under the previous cleanup grant; complying with state/local requirements; and following a finalized Removal Action Workplan to carry out cleanup actions on other sited funded by the previous Cleanup grant.

Sierra Institute also confirms their commitment to (i) comply with any land use restrictions and not impede the effectiveness or integrity of any institutional controls; (ii) assist and cooperate with those performing the cleanup and provide access to the property; (iii) comply with all information requests and administrative subpoenas that have or may be issued in connection with the property; and (iv) provide all legally required notices.

#### **11. Cleanup Authority and Oversight Structure**

- a. Plumas County and Region 9 EPA are currently providing oversight for cleanup implementation on three sites within the Crescent Mills property and will continue to provide oversight for the new proposed site. Sierra Institute will continue to consult with EPA to ensure the cleanup is protective of human health and the environment. Sierra Institute staff (including a Board member specializing in Brownfields law) along with qualified consultants have successfully carried out cleanup implementation on the Property to date and have the background knowledge/technical expertise necessary to conduct, manage, and oversee cleanup actions for the proposed site.
- b. Accesses to a neighboring property may be utilized to source additional clean fill material for cleanup actions. Sierra Institute is in preliminary conversations with the California Department of Transportation (Caltrans) who may decide to remove clean fill on their adjacent wetland mitigation site in order to improve the quality of the site. If this option is pursued, Sierra Institute coordinate with Caltrans to ensure all necessary planning and implementation requirements (soil sampling, permitting, etc.) are completed.

#### **12. Community Notification**

- a. Draft ABCA is attached.
- b. Community Notification Ads are attached.
- c. A public meeting was held on October 21, 2020 (announced October 14, 2020). Meeting details and notes are attached.

#### **13. Statutory Cost Share**

- a. Sierra Institute will meet a 20% cost share of \$100,000.00 utilizing on-site clean fill material owned by the Sierra institute. This will greatly reduce off-site trucking costs as well as trucking related emissions.

**ARTICLES OF INCORPORATION/ NON-PROFIT STATUS**

ENDORSED  
FILEDIn the office of the Secretary of State  
of the State of California

OCT 27 1997

  
BILL JONES, Secretary of State

## ARTICLES OF INCORPORATION

## I

The name of this corporation is Forest Community Research.

## II

A. This corporation is a nonprofit **PUBLIC BENEFIT CORPORATION** and is not organized for the private gain of any person. It is organized under the Nonprofit Public Benefit Corporation Law for public purpose.

B. The specific purpose of this corporation is to advance education and science.

## III

The name and address in the State of California of this corporation's initial agent for service of process is:

Jonathan Kusel  
1657 Diamond Mountain Road  
Greenville, CA. 95947

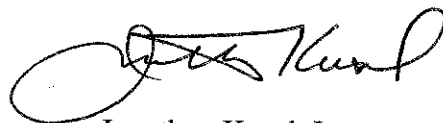
## IV

A. This corporation is organized and operated exclusively for public purposes within the meaning of Section 501(c)(3), Internal Revenue Code.

B. No substantial part of the activities of this corporation shall consist of carrying on propaganda, or otherwise attempting to influence legislation, and the corporation shall not participate or intervene in any political campaign (including the publishing or distribution of statements) on behalf of any candidate for public office.

## V

The property of this corporation is irrevocably dedicated to public benefit purposes and no part of the net income or assets of this corporation shall ever inure to the benefit of any director, officer or member thereof or to the benefit of any private person. Upon the dissolution or winding up of the corporation, its assets remaining after payment, or provision for payment, of all debts and liabilities of this corporation shall be distributed to a nonprofit fund, foundation or corporation which is organized and operated exclusively for public benefit purposes and which has established its tax exempt status under Section 501(c)(3), Internal Revenue Code.



Jonathan Kusel, Incorporator

A0625262

**CERTIFICATE OF AMENDMENT OF  
ARTICLES OF INCORPORATION**

**ENDORSED - FILED**  
In the office of the Secretary of State  
of the State of California

**JAN 31 2005**

The undersigned certify that:

1. They are the **president** and the **secretary**, respectively, of Forest Community Research, a California corporation.

2. Article I of the Articles of Incorporation of this corporation is amended to read as follows: ,

The name of this corporation is **Sierra Institute for Community and Environment**.

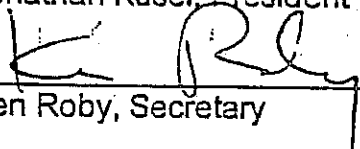
3. The foregoing amendment of Articles of Incorporation has been duly approved by the board of directors.

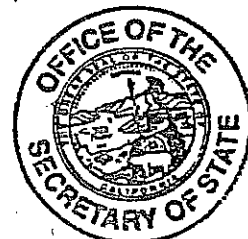
4. The corporation has no members.

We further declare under penalty of perjury under the laws of the State of California that the matters set forth in this certificate are true and correct of our own knowledge.

DATE: 1-25-05

  
Jonathan Kusel, President

  
Ken Roby, Secretary





**CERTIFICATE OF AMENDMENT OF  
ARTICLES OF INCORPORATION**

The undersigned certify that:

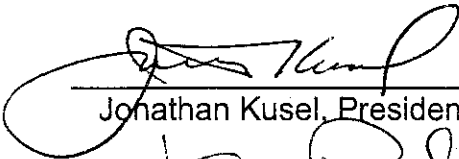
1. They are the **president** and the **secretary**, respectively, of Forest Community Research, a California corporation.
2. Article I of the Articles of Incorporation of this corporation is amended to read as follows:

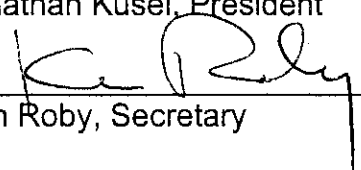
The name of this corporation is **Sierra Institute for Community and Environment**.

3. The foregoing amendment of Articles of Incorporation has been duly approved by the board of directors.
4. The corporation has no members.

We further declare under penalty of perjury under the laws of the State of California that the matters set forth in this certificate are true and correct of our own knowledge.

DATE: 1-25-05

  
\_\_\_\_\_  
Jonathan Kusel, President

  
\_\_\_\_\_  
Ken Roby, Secretary

INTERNAL REVENUE SERVICE  
P. O. BOX 2508  
CINCINNATI, OH 45201

DEPARTMENT OF THE TREASURY

Date: **AUG 23 2002**

FOREST COMMUNITY RESEARCH  
PO BOX 11  
TAYLORSVILLE, CA 95983

Employer Identification Number:  
91-1818166  
DLN:  
17053096779052  
Contact Person:  
MICHAEL A LUDWIG ID# 31470  
Contact Telephone Number:  
(877) 829-5500  
Our Letter Dated:  
January 1998  
Addendum Applies:  
No

Dear Applicant:

This modifies our letter of the above date in which we stated that you would be treated as an organization that is not a private foundation until the expiration of your advance ruling period.

Your exempt status under section 501(a) of the Internal Revenue Code as an organization described in section 501(c)(3) is still in effect. Based on the information you submitted, we have determined that you are not a private foundation within the meaning of section 509(a) of the Code because you are an organization of the type described in section 509(a)(1) and 170(b)(1)(A)(vi).

Grantors and contributors may rely on this determination unless the Internal Revenue Service publishes notice to the contrary. However, if you lose your section 509(a)(1) status, a grantor or contributor may not rely on this determination if he or she was in part responsible for, or was aware of, the act or failure to act, or the substantial or material change on the part of the organization that resulted in your loss of such status, or if he or she acquired knowledge that the Internal Revenue Service had given notice that you would no longer be classified as a section 509(a)(1) organization.

You are required to make your annual information return, Form 990 or Form 990-EZ, available for public inspection for three years after the later of the due date of the return or the date the return is filed. You are also required to make available for public inspection your exemption application, any supporting documents, and your exemption letter. Copies of these documents are also required to be provided to any individual upon written or in person request without charge other than reasonable fees for copying and postage. You may fulfill this requirement by placing these documents on the Internet. Penalties may be imposed for failure to comply with these requirements. Additional information is available in Publication 557, Tax-Exempt Status for Your Organization, or you may call our toll free number shown above.

If we have indicated in the heading of this letter that an addendum applies, the addendum enclosed is an integral part of this letter.

Letter 1050 (DO/CG)

**DRAFT ABCA POSTED FOR PUBLIC REVIEW**

**Analysis of Brownfield Cleanup Alternatives – Preliminary Evaluation**  
**Former Louisiana Pacific Mill Site - Crescent Mills**  
15690 Highway 89, Crescent Mills, California, 95934

Original: October 18, 2017  
Updated: November 8, 2019  
Updated: October 12, 2020

Prepared by:



## **I. Introduction & Background**

### ***a. (1) Site Location***

The Site is located at 15690 Highway 89, Crescent Mills, California, 95934. The geographic coordinates for the approximate center of the Site are 40° 05' 39" North Latitude and 120° 54' 37" West Longitude. The Site includes 26.27 acres of land within Assessor's parcel numbers 111-050-065, 111-050-066, and 111-050-067.

### ***a. (2) Climatic Setting***

Like most of the Sierra Nevada region of California, the climate in Crescent Mills is seasonal with generally dry summer months between June and September and wetter winter months between October and May. Monthly average temperatures in the nearby town of Quincy range from a low of 48° and high of 89° Fahrenheit in July to a low of 26° and high of 44° Fahrenheit in December (WorldClimate.com). According to the Plumas County Geographic Information Systems Division (2012), annual precipitation in Crescent Mills amounted to 39 to 47 inches of rain between the years 1971 and 2000. Crescent Mills lies at approximately 3,530 feet above sea level; at this elevation snow is infrequent but possible in winter months.

### ***b. Previous Site Use(s)***

The Site was initially developed as a lumber mill in the late 1940s to early 1950s. Before the lumber mill was built, the property was likely used for agriculture. The Site was purchased by Louisiana Pacific (LP) Corporation in the early 1970s and the mill was expanded. Louisiana Pacific Corporation operated the Site as a lumber mill until it was closed in 1986. The Lehman family of Cinderlite Trucking Co. purchased the property from Louisiana Pacific Corporation in 1998. Sierra Institute purchased the property on October 25, 2017.

### ***c. Site Assessment Findings***

Previous investigations performed at the Site include:

- Preliminary Assessment/Site Inspection Report (California Environmental Protection Agency Department of Toxic Substances Control [DTSC], 1990)

- Property Transfer Site Assessment (CH2M Hill, Inc. [CH2M Hill], 1991)
- Supplemental Site Investigation Report (Geocon Consultants, Inc. [Geocon], 2002)
- Phase I ESA (E&E, 2014)
- Targeted Brownfield Assessment (E&E, 2014)
- Targeted Site Investigation (Geosyntec Consultants, 2017)
- Site Characterization Report, Removal Action Workplan and Appendices (Sierra Institute, Sierra Streams Institute, and EKI Environment & Water Inc., 2019)

Copies of more recent reports can be found at: <https://sierrainstitute.us/program/ivwpc/>

Following several site assessments, it was determined that there were two primary constituents of potential concern (COPCs) within the Site; arsenic and TPH-d (total petroleum hydrocarbons in the diesel range). Arsenic in the soil is the most widespread COPC, appearing in several areas throughout the site above the Regional Screening Level (RSL) or site-specific background concentration of 9.8 milligram per kilogram (mg/kg). Groundwater sampling has indicated that arsenic in the soil has not resulted in groundwater impacts at the Site. The source of arsenic that is present throughout the Site may be related to historic lumber mill operations and practices (such as spreading incinerator ash on the roadways for dust suppression purposes), but could also potentially have been present in the import fill material brought to the Site to raise the surface grade. The import fill may have been derived from off-Site mining operations, as the Crescent Mills area has several reported gold mines and arsenic is commonly found to be associated with gold deposits. Regardless of source, arsenic concentrations in shallow soil exceed the established background concentration across much of the site.

TPH-d have also been reported in soil in throughout the Site in exceedance of RSLs. TPH-d was reportedly stored at the Site when the sawmill was in operation, and was used to operate the boiler and various other machinery, and may have been spread on former mill roads along with waste oil for dust suppression.

Several potential contaminants were thought to be in groundwater samples in areas near the old locations of the sawmill and boiler building, including dioxins and furans; however, the reported concentrations of groundwater constituents were narrowly above the screening levels and may have been influenced by elevated turbidity introduced by the collection method.

More recent site assessments do not include evaluation or investigation of any adjacent or off-Site properties that may or may not be contaminated, which is particularly pertinent as the neighboring properties to the north and east were part of the former LP lumber mill and therefore had similar use as the Site. There is a possibility that the source of impacts observed along the property boundaries may originate off-Site.

The consultants that performed the Targeted Site Investigation (TSI) certified that the data indicates that COPCs in soil and groundwater are sufficiently delineated and the potential risk to human health in a commercial/industrial land use scenario was adequately evaluated. The consultants recommended the following:

- 1) Further investigation is not necessary and the data should be used to prepare a Feasibility Study/Remedial Action Plan for selection and implementation of an appropriate remedial alternative to facilitate the development and re-use of the Site.
- 2) Though arsenic concentrations remained below the background concentration established for the Site in some of the soil and wood waste stockpiles, the material in the stockpiles should be suitable for unrestricted use only in areas where background arsenic concentrations in soil are similar.
- 3) Erosion control structures should be placed around the existing stockpiles to control run-off of sediment from the piles into the nearby storm water drop inlets and/or Indian Creek.
- 4) The existing log deck supply well and any other wells identified on the property should be decommissioned in accordance with the Plumas County Environmental Health Department (PCEHD) and state regulations.

***d. Project Goal***

Remediation of the Crescent Mills Site will enable the development of a multi-business, wood products campus (Indian Valley Wood Utilization Campus [IVWPC]). The IVWPC will employ various methods to process and convert low-value biomass material from surrounding forestland into value-added timber and biomass products. Development of a market for this low-value material will help to improve socioeconomic and forest health conditions by: 1) facilitating the generation of sustainable forest product industry jobs, 2) creating and maintaining a reliable outlet for forest restoration byproducts, and 3) enabling forest managers to implement forest/watershed restoration and fuels reduction projects at the pace and scale necessary to establish healthy, resilient landscapes.

Creating a market for utilizing low-value forest biomass is a high priority for this region of California, as the compounding stressors of drought, insect, disease, climate change, and catastrophic wildfire clearly establish a need to improve forest and watershed health, increase resiliency of communities within the wildland-urban interface to wildfire, and promote the socioeconomic well-being. Planned biomass facilities include wood chip processing, firewood, bioenergy, and other wood products businesses that utilize forest restoration byproducts and other woody waste. The IVWPC will create employment opportunities in Plumas County (a rural and socioeconomically disadvantaged county), and contribute to reduced fire risk and increased forest and watershed health throughout the Upper Feather River Watershed - the headwaters of the California State Water Project, which not only provides reliable water to approximately 27 million Californians and 750,00 acres of farmland, but also has the benefit of providing flood management, power generation, recreation, and critical fish and wildlife habitat. Furthermore, wood chips imported to and produced at this facility will fuel a network of biomass boilers that heat critical institutions around the county, including a heating system at the county Health and Human Services Center in Quincy. Overall, the Site has the potential to bring between 15 and 30 new jobs to the rural community, depending on how many and what types of businesses are created.

## **II. Applicable Regulations and Cleanup Standards**

### ***a. Cleanup Oversight Responsibility***

The cleanup will be overseen by the United States Environmental Protection Agency (EPA). The site is currently listed on the DTSC EnviroStor database as Site number 32240003 and project code 102305 and on the EPA Envirofacts as EPA Registry Id number 110070068960.

### ***b. Cleanup Standards for Major Contaminants***

It is anticipated that state standards for industrial re-use will be used as the cleanup standards for this property.

### ***c. Laws and Regulations Applicable to the Cleanup***

Laws and regulations applicable to this cleanup may include the Federal Small Business Liability Relief and Brownfields Revitalization Act, the federal Davis- Bacon Act, and federal, state, and local laws regarding procurement of contractors to conduct the cleanup. Appropriate permits for cleanup, if any, will be acquired from the Plumas County Building Department.

## **III. Cleanup Alternatives**

### ***a. Cleanup Alternatives Considered***

To address contamination at the site, three different alternatives were considered, including:

Alternative #1: No Action

Alternative #2: Excavation with Offsite Disposal and Institutional Controls

Alternative #3: Capping and Institutional Controls

### ***b. Evaluation of Cleanup Alternatives***

1. The No Action Alternative is included as a baseline for comparison to other proposed alternatives. This alternative assumes that the impacted areas would remain in place without treatment. This alternative would not provide mitigation of the actual or potential risks posed. If no corrective action is taken, the site may not be suitable for the planned reuse.

i. No costs would be incurred during the implementation of this alternative.

2. The Excavation with Offsite Disposal and Institutional Controls Alternative includes excavation of one foot of soil from unpaved surfaces, focused on the northern half of the property. Gravel (aggregate base) would be placed as backfill to the current grade. Institutional controls in the form of land use covenants may need to be recorded limiting future use of the property to industrial use. For this Alternative, contaminated and potentially contaminated soil would be removed from areas with contamination documented in exceedance of RSL or site-specific background levels.

- i. Cost of this treatment per acre estimated<sub>1</sub> to be \$546,000.
- ii. Much of this cost is associated with transportation and disposal of excavated soil to an offsite landfill.

**3.** The Capping and Institutional Controls includes placing a layer of fill as a barrier to cap the contaminated soil. Institutional controls in the form of land use covenants may need to be recorded limiting future use of the property to industrial use. In this Alternative, a clean barrier would be developed over contaminated and potentially contaminated soils, but would also require ongoing monitoring and maintenance of the cap over time.

- i. Cost of this treatment per acre estimated<sub>2</sub> to be \$61,000.
- ii. The cost of this option is significantly less than Alternative #2 as it does not involve transportation and disposal of excavated soil to an offsite landfill. The cost per acre includes material and equipment time.

*c. Recommended Cleanup Alternative*

The recommended cleanup alternative is Alternative #3: Capping and Institutional Controls, as this provides the most cost effective and efficient method to remediate the property, enable the timely redevelopment of the property, and effectively ensure the health and safety of future workers on the site. Cost effectiveness is a priority for the Sierra Institute as the cleanup will need to be fully grant funded given the limited financial capacity of this community-based non-profit organization in the context of Brownfield cleanup. In addition, the expedited timeframe for redevelopment provided by this alternative is critical to increasing the socioeconomic well-being of this rural community through the creation of jobs, and increase in pace and scale of forest/watershed restoration projects.



**PUBLIC NOTICES FOR COMMUNITY MEETINGS**

**\*Fliers were also posted in community centers\***

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Sierra Institute is seeking an EPA grant to help clean up the former mill site in Crescent Mills. Public input is sought. Photo submitted

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# Public comments sought for Phase III of Crescent Mills Brownfield site redevelopment

📅 October 14, 2020    👤 Editor

Work continues to clean up the former Louisiana Pacific Mill site in Crescent Mills.

Following several years of negotiating planning and liability challenges, cleanup efforts are well underway. Over the past two years, Sierra Institute for Community and Environment (Sierra Institute) has made significant progress in cleaning up the site and has been advancing a variety of planning processes necessary to redevelop this Brownfield site into a wood products campus.

Sierra Institute is applying for an EPA Brownfield Cleanup Grant to fund cleanup and redevelopment of the former Louisiana Pacific mill site. Prior to submitting the application, Sierra Institute is seeking public comment on the proposed action.

The following documents are available for review and comment either online or at the Sierra Institute's office in Taylorsville, Ca at 4438 Main Street.

EPA Cleanup Application for Phase 3 (DRAFT)

EPA Cleanup Analysis of Brownfield Cleanup Alternatives (ABCA) for Phase 3 (DRAFT)

There will also be a virtual public meeting held on Wednesday, Oct. 21, from 5:30 – 6:30 p.m. Please register for the event online at: <https://us02web.zoom.us/join/zoom/register/tZErF-2rrzksG9AMk007tNh-SEuK4ygioPi1>

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Public comments sought for Phase III of Crescent Mills Brownfield site redevelopment:

PUBLIC MEETING -  
Wednesday October 21st, 2020

Following several years of negotiating planning and liability challenges, cleanup efforts are well underway at the Crescent Mills site. Over the past two years, Sierra Institute for Community and Environment (Sierra Institute) has made significant progress in cleaning up the site and has been advancing a variety of planning processes necessary to redevelop this Brownfield site into a wood products campus.

Sierra Institute is applying for an EPA Brownfield Cleanup Grant to fund cleanup and redevelopment of the former Louisiana Pacific mill site in Crescent Mills, Ca. Prior to submitting the application, Sierra Institute is seeking public comment on the proposed action.

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<https://sierrainstitute.us/.../EPA-Cleanup-Grant-App...>

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<https://sierrainstitute.us/.../EPA-Cleanup-Grant-App...>

There will also be a virtual public meeting held on Wednesday, October 21, 2020 from 5:30 pm -6:30 pm. Please register for the event online at:

<https://us02web.zoom.us/j/tZErf-2rrzksG9AMk007tNh...>

After registering, you will receive a confirmation email containing information about joining the meeting.

Please direct any questions or comments to Danielle Berry at [dberry@sierrainstitute.us](mailto:dberry@sierrainstitute.us) or by phone at (530) 284-1022.

## **PUBLIC MEETING NOTES**



## **EPA Brownfield Cleanup Grant Application FY 2021 Public Meeting Summary & Comments/Responses**

Meeting Date: 10/21/20

Meeting Time: 5:30pm-7pm

Location: Virtual via online meeting platform Zoom

### **Summary of Public Meeting**

Sierra Institute for Community and Environment (Sierra Institute) held a public meeting for in accordance with the FY 2021 EPA Brownfield Cleanup Grant Program application on November 21, 2020 via the online meeting platform Zoom. The public was notified of the public meeting and public comment period via three outlets: 1) a notice in the local newspaper, the Indian Valley Record, on 10/14/2020; 2) flyers posted on local bulletins in Taylorsville, Crescent Mills, and Greenville; and 3) informational posts on the Sierra Institute website and other social media outlets. These notices provided an overview of the actions being proposed under this application, locations to access the Analysis of Brownfield Alternatives (ABCA) and draft application – hard copy at the Sierra Institute Office and online via the organizations website, methods for providing comment on the proposal, and contact information of staff that could address any inquiries.

The public meeting included a presentation that addressed the following topics:

- Summary of the Sierra Institute and its interest in the cleanup and redevelopment of the Crescent Mills site.
- Overview of the current socioeconomic and environmental conditions that establish a need for community revitalization and biomass utilization to support increased forest restoration efforts.
- History of the Crescent Mills site as a sawmill.
- The proposed development of a wood products campus to generate value-added products from forest biomass in order to facilitate an increase in the pace and scale of forest and watershed restoration efforts as well revitalize local communities.
- The types of operations (current, future, and proposed) that will be on the redeveloped site.
- Brownfields sites and the EPA Brownfield Cleanup Grant Program
- Site characteristics including locations and levels of the primary contaminant as well as the possible methods to remediate the site as outlined in the ABCA.
- Assessments completed on the site to date.
- Cleanup activities completed to on site to date.
- Remaining cleanup activities necessary to enable redevelopment.
- Past and current funds secured to carryout assessment, planning and cleanup efforts.
- Review of the draft proposal.

- Locations to access project documents and methods to provide input.

### **Summary of Q/A's during Public Meeting:**

*\*\*Several participants were returning community members that had several questions and commentary pertaining to the redevelopment plans for the site as well as the organization other forestry-based initiatives . While these were addressed, they have not been recorded below as they do not pertain directly to the cleanup activities. \*\**

**Q1:** What businesses will be on the site?

**A1:** The heart of the site will be a 3-5 MW (community scale) bioenergy facility. A bioenergy facility uses organic waste, such a forest byproduct from thinning operations, to generate heat and/or power.

**Q2:** When will development of the site start?

**A2:** Development has been initiated on remediated portions of the site in the form of a wood chip processing and storage facility. These chips are sourced from local fuels reduction projects and are used to fuel the boiler in Quincy. Planning is underway for addition site buildout will be initiated once funding/entrepreneurs are identified to support these businesses.

**Q3:** What mill operations would have resulting in arsenic contamination?

**A3:** The assessments revealed that the arsenic contamination likely was a result of mill operations such as spreading oil and incinerator ash on the roadways, and chemical treatments of wood products. However, it is possible that it was imported with fill material sourced from mining operations. Arsenic is commonly associated with gold mining.

**Q4:** If these is dust from cleanup activities, should we be worried about it being contaminated?

**A4:** Remedial actions at the site currently underway are utilizing clean fill and are not disturbing areas classified as contaminated; therefore, if there were fugitive dust emissions they would not be contaminated. However, we are currently using a water truck and monitoring cleanup activities to prevent fugitive dust emissions from leaving the site. During the 2019 implementation season when we were first breaking ground, several air monitors were installed to monitor and prevent fugitive dust emissions. Sierra Institute and their contractors are taking all necessary precautions to ensure this is a clean and safe remediation process.

**Q5:** Is arsenic in the groundwater?

**A5:** It was found that arsenic is not impacting the groundwater. The assessments looked at whether the arsenic was moving and it was determined that it was only in the soil.

**Q6:** What is a "background level"?

**A6:** The background level at the site is 9.8 mg/kg . This is determined by taking samples all over the property. In most places throughout the site arsenic was just above the background level so it is not a major concern.

**Q7:** If arsenic isn't a major concern then why do you need to clean it up?

**A7:** Although the levels are not high, they are still above the established background level. We are cleaning the site to prevent continued exposure and to ensure a safe site for future development. We are proposing to remediate the site by placing a clean soil cap over the contaminated areas.

**Q8:** What is currently been done on the site to date?

**A8:** Right now, contractors are working under a previously awarded cleanup grant to relocate and recycle remanent concrete on the site for reuse as clean fill (capping material) on the site. But crushing and reusing this material we are able to maximize the amount of on-site fill available for remedial activities, expedite redevelopment, and greatly reduce costs and emissions associated with off-hauling the material.

**Q9:** As a non-profit, how are you going to continue to fund remediation and redevelopment efforts?

**A9:** We are constantly looking for and securing funds for site cleanup and development. That is why we are applying for this round of EPA Cleanup Grants to address a new site on the property. To date we've secured funds from several federal, state, and private entities to complete this work and we are optimistic we can acquire more. This is an important project for not only Crescent Mills, but for all of us here in Indian Valley. What we are doing and learning here will be shared with rural communities throughout the Sierra.

**Public Comments:**

Other than the dialog at the public meeting, no public comments were received.

**List of Registrants:**

Guy McNett  
Ray Stewart  
Marty Walters  
Lorena Gorbet  
Eliot Cooper  
Hilary Martin  
Darrah Hopper  
Moorea Stout  
2 unknown call in but identified as community members  
Danielle Berry  
Jonathan Kusel  
Kyle Leach



## **HARDSHIP WAIVER REQUEST**

## FY 2021 EPA Brownfield Cleanup Hardship Waiver Request

The Sierra Institute for Community and Environment hereby submits its request for a waiver of the 20% cost share requirement which would amount to \$100,000 under this proposal.

To date, the Sierra Institute is in the process of carrying out two separate cleanup grants and is successfully meeting cost share requirements amounting to a total of \$220,000.

As detailed in the narrative, the target area for this project has been subjected to declining socioeconomic conditions since the significant decline of the timber industry in the 1980's. Recovery efforts are continuously encumbered as these communities face repeated challenges to revitalization including the Great Recession, reoccurring catastrophic wildfire, and more recently the global Covid-19 pandemic.

Similar to many communities throughout California, the Target Area has experienced several large-scale, catastrophic wildfires in its recent history including 2007 Moonlight Fire, the 2012 Chips Fire, the 2019 Walker Fire, and the 2020 North Complex Fire which has burned 318,731 acres to date. Smoke from fires such as these settle in Indian Valley and nearby communities for weeks to months exposing the population to significantly increased levels of three primary pollutants: 1) Particulate matter (PM 2.5 and PM 10), 2) Ground level ozone, and 3) Carbon monoxide; leading to increased rates of respiratory, cardiovascular, and other related illnesses. Although North Complex fire resulted in the loss of 15 lives, the destruction/damage of over 2,000 structures, and threatened many communities, Plumas County was not listed on the federal disaster declaration for California (DR-4569-CA); however, due to severe fire impacts the State declared disasters for all California counties. These fires not only cause direct harm to life and property but decimate the landscape and subject rural communities to months of harmful smoke emissions that significantly impact the health and well-being of all community members and debilitate the tourism market which is a primary source of income for many.

These issues are further compounded by the Covid-19 pandemic which has forced many local businesses to close and poses a looming threat to rural communities which have not undergone peak outbreaks like metropolitan areas. These communities are less equipped to successfully combat the virus given high levels of chronic health issues and other at-risk populations coupled with inadequate health care infrastructure and resources.

The unemployment rate in Plumas County is 11.2% and the per capita income is \$32,710 (in 2018 inflation adjust dollars). Details regarding unemployment trends in Plumas County are included in Section 1.a.I, page 4, of the Narrative. The compounding socioeconomic stressors mentioned above have resulted in a significant decline in local job availability and sustainability leading to substantial out-migration. The specialization shift, and reduction, of local employment opportunities has hampered the workforce capacity. Families who once relied on forest-based employment are challenged to transfer trade skills to current more technological based career opportunities and younger generations struggle to find employment in the limited job market without job training and professional development opportunities. As a result, many workers are employed at less than full-time or at less skilled tasks (or completely different tasks) than their training or abilities permit.

## Application for Federal Assistance SF-424

\* 1. Type of Submission:

- ☐ Preapplication  
☒ Application  
☐ Changed/Corrected Application

\* 2. Type of Application:

- ☒ New  
☐ Continuation  
☐ Revision

\* If Revision, select appropriate letter(s):

\* Other (Specify):

\* 3. Date Received:

10/28/2020

4. Applicant Identifier:

5a. Federal Entity Identifier:

5b. Federal Award Identifier:

BF

State Use Only:

6. Date Received by State:

7. State Application Identifier:

### 8. APPLICANT INFORMATION:

\* a. Legal Name: Sierra Institute for Community and Environment

\* b. Employer/Taxpayer Identification Number (EIN/TIN):

911818166

\* c. Organizational DUNS:

0127422890000

### d. Address:

\* Street1: 4438 Main St. P.O. Box 11

Street2:

\* City: Taylorsville

County/Parish:

Plumas

\* State: CA: California

Province:

\* Country: USA: UNITED STATES

\* Zip / Postal Code: 959830011

### e. Organizational Unit:

Department Name:

Division Name:

### f. Name and contact information of person to be contacted on matters involving this application:

Prefix: \* First Name: Jonathan

Middle Name:

\* Last Name: Kusel

Suffix:

Title: Executive Director

Organizational Affiliation:

\* Telephone Number: (530) 284-1022

Fax Number:

\* Email: jkusel@sierrainstitute.us

## Application for Federal Assistance SF-424

### \* 9. Type of Applicant 1: Select Applicant Type:

M: Nonprofit with 501C3 IRS Status (Other than Institution of Higher Education)

Type of Applicant 2: Select Applicant Type:

Type of Applicant 3: Select Applicant Type:

\* Other (specify):

### \* 10. Name of Federal Agency:

Environmental Protection Agency

### 11. Catalog of Federal Domestic Assistance Number:

66.818

CFDA Title:

Brownfields Assessment and Cleanup Cooperative Agreements

### \* 12. Funding Opportunity Number:

EPA-OLEM-OBLR-20-07

\* Title:

FY21 GUIDELINES FOR BROWNFIELD CLEANUP GRANTS

### 13. Competition Identification Number:

Title:

### 14. Areas Affected by Project (Cities, Counties, States, etc.):

Add Attachment

Delete Attachment

View Attachment

### \* 15. Descriptive Title of Applicant's Project:

Sierra Institute Crescent Mills Cleanup Phase III

Attach supporting documents as specified in agency instructions.

Add Attachments

Delete Attachments

View Attachments

**Application for Federal Assistance SF-424****16. Congressional Districts Of:**

\* a. Applicant

CA1

\* b. Program/Project

CA1

Attach an additional list of Program/Project Congressional Districts if needed.

Add Attachment

Delete Attachment

View Attachment

**17. Proposed Project:**

\* a. Start Date:

10/01/2021

\* b. End Date:

09/30/2024

**18. Estimated Funding (\$):**

* a. Federal	500,000.00
* b. Applicant	100,000.00
* c. State	0.00
* d. Local	0.00
* e. Other	0.00
* f. Program Income	0.00
* g. TOTAL	600,000.00

**\* 19. Is Application Subject to Review By State Under Executive Order 12372 Process?**

- ☐ a. This application was made available to the State under the Executive Order 12372 Process for review on .
- ☒ b. Program is subject to E.O. 12372 but has not been selected by the State for review.
- ☐ c. Program is not covered by E.O. 12372.

**\* 20. Is the Applicant Delinquent On Any Federal Debt? (If "Yes," provide explanation in attachment.)**☐ Yes ☒ No

If "Yes", provide explanation and attach

Add Attachment

Delete Attachment

View Attachment

**21. \*By signing this application, I certify (1) to the statements contained in the list of certifications\*\* and (2) that the statements herein are true, complete and accurate to the best of my knowledge. I also provide the required assurances\*\* and agree to comply with any resulting terms if I accept an award. I am aware that any false, fictitious, or fraudulent statements or claims may subject me to criminal, civil, or administrative penalties. (U.S. Code, Title 218, Section 1001)**

☒ \*\* I AGREE

\*\* The list of certifications and assurances, or an internet site where you may obtain this list, is contained in the announcement or agency specific instructions.

**Authorized Representative:**

Prefix:

\* First Name:

Jonathan

Middle Name:

\* Last Name:

Kusel

Suffix:

\* Title:

Executive Director

\* Telephone Number:

(530) 284-1022

Fax Number:

\* Email:

jkusel@sierrainstitute.us

\* Signature of Authorized Representative:

Jonathan P Kusel

\* Date Signed:

10/28/2020